

Testimony of David DeGennaro, Agriculture Policy Specialist, National Wildlife Federation
Environmental Protection Agency Public Hearing
Public Hearing for Standards for 2018 and Biomass-Based Diesel Volume for 2019 Under the
Renewable Fuel Standard Program
Docket No. EPA–HQ–OAR–2017–0091
August 1, 2017

My name is David DeGennaro, and I am an agriculture policy specialist for the National Wildlife Federation, the nation's largest conservation organization, with 51 state and territorial affiliates and more than 6 million members and supporters around the country.

While NWF supports the law's intended goals of moving to more sustainable second generation biofuels and real greenhouse gas emission reductions, those objectives have not been realized. In their place have come numerous unintended consequences that have been a disaster for wildlife, native prairie, and water.

Demand for corn to meet a mandate of 15 billion gallons of conventional biofuel has helped drive the conversion of more than 7 million acres of grassland, wetlands, and other wildlife habitat. Less than 10 percent of our native prairies remain intact, and plowing them over to plant corn or other crops results in a devastating loss of biodiversity, enormous release of carbon dioxide, and elimination of hunting and grazing opportunities.

The bulk of the habitat loss has occurred in ecologically important areas of the country. The Prairie Pothole region of the Northern Plains is America's duck factory, producing 60 percent or more of the ducks and other waterfowl that migrate to the rest of the country. Monarch butterflies and honey bees; threatened or endangered species such as the whooping crane, piping plover, Topeka shiner, and the greater and lesser prairie chicken all rely on habitat in areas heavily impacted by the increase in corn production over the last decade.

With millions of acres of added industrial-scale corn production has come additional farm runoff flowing into our streams, lakes, and bays. Lake Erie has seen massive algal blooms of increasing severity each summer since 2008. Efforts like restoring the Chesapeake Bay and combatting Gulf hypoxia have been made all the more challenging thanks to this intensification of corn agriculture across the country.

The scientific data around these impacts are mounting. The EPA is long past its statutory deadlines for completing its second triennial report, and we urge the agency to complete that as soon as possible to better inform decisions on the mandates going forward.

For the current rulemaking, NWF supports the proposal to reduce the overall mandate below the current level. However, we do not believe the reduction was large enough. Furthermore, the reduction of 40 million gallons comes solely from the cellulosic biofuel category, rather than from the conventional or biomass based diesel pools. The agency has the ability under law to adjust volumes based on "severe environmental harm," caused by the program, and the evidence of such harm is now clear. EPA should reduce the implied conventional mandate well below 15 billion gallons in order to alleviate this harm.

NWF supports the agency's rationale for not increasing the biomass based diesel requirement in 2019, which hinges largely on the impacts of feedstock substitution as vegetable oils such as soy are diverted from food and feed markets into biofuel production. Again, we think the agency should go further and reduce the number rather than hold it steady.

Finally, we urge the agency to modify its aggregate compliance approach to land conversion. In short, this policy has been a failure. Considering a nationwide aggregate total of "agricultural acres" runs completely contrary to Congress' intent when it clearly defined that renewable fuels had to originate from lands in production prior to 2007, and has allowed unchecked the massive conversion we have seen. The EPA should use this rulemaking to begin meaningful enforcement of the law in order to protect the valuable wildlife habitat and natural places that remain.

Thank you for the opportunity to be here to present these views.